

1 they price, package, promote, market their services.

2 Q RNS displays billing record information,

3 correct?

4 A Billing record information?

5 Q Yes.

6 A Yes.

7 Q And RNS displays the rate for the service and

8 calculates the taxes for that service; isn't that also

9 correct?

10 A That's correct.

11 Q Now, this functionality isn't currently

12 available for ALECs today; is it?

13 A It is not part of -- it's not part of the EDI

14 ordering interface. Again, pricing, promotion,

15 packaging, how a CLEC offers its services to its

16 customers is not something over which BellSouth has any

17 control. It's at the discretion of the CLEC. And a

18 CLEC can choose, using the industry standard ordering

19 method, to organize information on its side of the

20 interface in whatever way suits its pricing or marketing

21 objectives.

22 Q Ms. Calhoun, in RNS can a BellSouth service

23 representative see all the NXXs associated with valid

24 addresses?

25 A Yes. I found that answer at lunchtime, and it

1 is possible for them to do that, and they would access
2 that information through the telephone number selection
3 screen.

4 Q I don't think you need to refer to this, but
5 if you do I'll stop after I ask the question. In
6 Late-filed Exhibit No. 2 you provide average talk times
7 for BellSouth service representatives.

8 Are these average intervals based on service
9 representatives using RNS? That's going to be your
10 Late-filed Exhibit No. 2 and that's part of what has
11 been identified as Exhibit No. 43. And you can find
12 that on Page 381.

13 A This includes business and residential. So it
14 will include both RNS and DOE.

15 Q One last question. Why did BellSouth create
16 separate databases for ALECs instead of allowing ALECs
17 direct access to the same databases that BellSouth uses
18 for its retail services, retail operations?

19 A Well, there are a couple different reasons for
20 that. One is, of course, as I've talked about at
21 length, the industry recommends EDI for ordering, and so
22 BellSouth made available an EDI ordering interface, but
23 another reason is that BellSouth has an RNS system for
24 residence customers, and a DOE system for business
25 customers in four states, and a SONGS system for

ATTACHMENT 8



**MCI Telecommunications
Corporation**

**780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500**

August 18, 1997

**Ms. Ilene Barnett
Sales Director
BellSouth Interconnection Services
1980 West Exchange Place
Tucker, GA 30084**

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCImetro-BellSouth Interconnection Agreement:

Attachment VIII

2.1.3 Street Address Guide (SAG)

2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCI in the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCI on the same day as the change to the data is made.

This section clearly requires BellSouth to provide to MCI in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCI in electronic form the SAG data.

Ms. Forbes letter states, and I quote, " Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCI is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCI insists that BellSouth comply with the terms of its interconnection agreements with MCI and provide MCI in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCI's entry into the local market by forcing MCI to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.

Please reply to this letter no later than August 22, 1997.

Sincerely,



Walter J. Schmidt

cc: Marcel Henry - MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI
Joe Baker - BellSouth
Pam Lee - BellSouth

ATTACHMENT 9



BellSouth Telecommunications, Inc.
Room 34531 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 26, 1997

Ms. Helen Arthur
MCI Telecommunications Corporation
Suite 500
780 Johnson Ferry Road
Atlanta, Georgia 30342

RE: MCI/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following stipulation in the MCI/BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 .1 Street Address Guide (SAG)

Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCI the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCI on the same day as the change to the data is made.

Your interpretation of the above stipulation is that BellSouth will provide the Street Address Data, not online access, to MCI. However, the stipulation states that BellSouth is to provide the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access.

Sincerely,

A handwritten signature in cursive script that reads 'Cathy Forbes'.

Cathy Forbes
Compliance Manager
Interconnection Services

cc: Dene Barnett

ATTACHMENT 10

09/13/97

04:32

NO.002 D02
NO.474 P002/002

08/20/97 17:31

BELLSOUTH MCI ACCOUNT TEAM + 770 288 6963



BellSouth Interconnection Services
Suite 428
1800 West Exchange Place
Tucker, Georgia 30084

770 492-7900
Fax 770 621-6622

MCI Account Team

August 20, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCI with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCI/BST Interconnection Agreement, MCI can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCI would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCI may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Pam Lee'.

for Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
Marcel Henry - MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI

ATTACHMENT 11



BellSouth Interconnection Services**Memorandum**

File Code 000 000 000
Date May 20, 1997

To Bryan Green
Telephone number 404-267-5515
Fax number

From Rene Barnett
Telephone number 770-492-7525
Fax number

Subject Customer Record Bill Screen

Attached is a list detailing the major fields on a Customer Record Information System (CRIS) Bill screen and the BellSouth CLEC Access to Records Proposal. This information was furnished to me by Jim Childress.

Our conference call will be Tuesday, May 20, 3:00 p.m. EDT - 4:00 p.m. The conference bridge number is 205-970-3742, access code 4675.

Please call me if you have any questions or comments.

Jim C.

(404) 420-0031 - Fax

404 529-6191 - OPC

Memorandum
Page 2

Attachment 1
Page 1 of 2

Customer Record Information System (CRIS) Bill Screen

- N 1✓ Account number including area code and customer code.
- u 2. Screen Name
- u 3. Date of the Bill (*Bill cycle*)
- u 4. Status of Account. (*line or final*)
- u 5. Account Status Indicator
- u 6. Four digit abbreviation for the exchange (*Calling Exchange*)
- N 7✓ Class of Service
- u 8. Rate Group Identification
- N 9✓ Billing Name and Address
- P 10. Pay By Date - Date bill is considered past due
- P 11. Start Treatment Amount - Amount of money a customer must owe before treatment action is appropriate.
- u 12. Four digit code indicating the federal, state, local, etc. tax states of the account.
- P 13. Credit Classification
- P 14. Months in Credit Class - This is the number of months that an account has been in its present credit class
- u 15. RAO number (the first 3 numbers) for the customer's account as well as the customer's check digit (the last number).
- P 16. Refer Account Date - Date notice is mailed to a customer when a treatable amount is due
- P 17. Remove from Treatment Amount - The dollar amount an account must be reduced below to no longer be considered treatable.
- u 18. Taxing Area Code - Indicates the city, county, franchise, or surcharge tax rate on an account
- N 19✓ Toll Billing Exception - This code represents a restriction from certain types of calls (*Should show up under prod's SVC*)
- N 20✓ Primary Interexchange Carrier Code
- P 21. Date of Installation - *Date svc installed*
- P 22. Refer to Business Office - The date a referral is sent to the Collection Center/Account Center on a treatable amount
- 23. No Treatment - An indicator to stop computerized treatment of an account.
- 24. Toll Credit Limit
- ✓ 25. Deposit - An amount of money obtained to secure an account.
- P 26. Write Off Date
- u 27. Preferred Payment Date
- ✓ P 28. Calling Card Holder - indicator *that they have a calling card.*

Memorandum
Page 3

Attachment 1
Page 2 of 2

Customer Record Information System (CRIS) Bill Screen

- P 29. Amount Due - The current amount due on the account.
- U 30. Old Telephone Number/New Telephone Number
- P 31. Credit Information
- P 32. Credit Information Verified
- P 33. Bill Summary
- U 34. Features - A code indicating the available central office services in a customer's area to which the customer does NOT subscribe
- P 35. Itemized Calls - The total dollar amount of toll charges from all entities which appeared on each of the three preceding bills.
- P 36. Treatment History (12 months)
- P 37. Return Check History (12 months)
- P 38. Social Security Number
- P 39. Unregulated Billing
- P 40. Last Bill - The amount of the last bill
- P 41. Payments and Adjustments posted since the last bill
- U 42. Transfer - Amount of money transferred from another account with the telephone number indicating where the balance originated.
- P 43. Balance - Balance after last bill plus/minus any payments and adjustments
- U 44. Late Payment Charge
- P 45. Current month's total charges for charges incurred since last month's bill
- 46. Total of current charges and any unpaid charges from previous bills.
- 47. BellSouth Charges
- 48. Interexchange Charges
- 49. Payments and Adjustments Through Bill
- 50. Payments and adjustments posted during the current billing cycle
- V 51. Memo Screen for making customer notations

BellSouth Interconnection Services**Memorandum**

Date July 2, 1997

To Joe Baker

cc: Scott Schaefer
Pam Lee
Kathy Wilson-Chu
Ilene Barnett
Bob Siegel
Linda Tate
File

From Randy Kinkaid

Telephone Number 404-927-7530

Fax Number 404-529-7074

Subject Response to MCI's OSS Issues

The attached addresses the OSS Interface issues raised by MCI's Bryan Green in his 6/29 memo.

This should provide the immediate feedback Bryan needs with hopes of getting into more detail or further discussions at a later time.

Please call me with any questions or concerns.

Response to MCI's OSS Issues

BST Position on TCP/IP SSL3

SSL3 adds encryption to the TCP/IP layer. SSL3 is not a national standard, nor have the standards bodies made SSL3 a "recommendation." SSL3 is under consideration as a national standard after winning out over EC-Lite. It currently resides with the Local Ordering Sub-Committee of ECIC for recommendation.

IF SSL3 becomes the national standard, BellSouth will develop the pre-ordering system to meet this standard, if CLECs request the development.

UNE OSS support

BST will support electronic ordering via EDI of Loop, Port, INP (interim number portability) and Loop with INP by the end of July, and via LENS in September. Loop and port combinations will follow (for Kentucky, only).

Electronic Bonding for maintenance

BellSouth has agreed to develop electronic bonding for maintenance and repair in several CLEC contracts. The electronic bonding gateway for EC TA will be ready during November.

Electronic access to CSR

Electronic access to customer service records is currently available to CLECs via the LENS interface. CLECs must have a CSR letter of authorization on file with BST to obtain access.

Customer record access is a pre-order function not an ordering function, and as a result, the customer record will not be available via EDI. LSI will not be used because this does not provide the CLEC enough data for certain order types.

LENS Issues

The LENS users guide contains sufficient information on the LENS specification for a CLEC to connect to and use LENS. Internet Explorer is supported by LENS, and the help desk/SPOC is operational.

Pre-order functionality

ICREF was part of the interim solutions previous to LENS.

LENS queries DSAP for due date information.

EDI Documentation

EDI documentation is contained in the two volumes of the Local Exchange Ordering Guide that has been provided to MCI. Updates and information will accompany notification of major releases, and new guides will be shipped to all those who have received the guide and are in BST's database.

Role of LESOG

Local Exchange Service Order Generator's (LESOG) role is to mechanically generate service orders. LESOG is a system that pulls orders from the Local Exchange Ordering (LEO) database, and selects those orders that can be processed electronically, and sends those orders downstream.

CRIS DATA ELEMENTS NOT PROVIDED TO CLECS-

***Social Security Number**

BellSouth does not pass an end user's SSN. This is not shared because of the expectation of the end user that it is not shared with outside parties (end user privacy issue).

***Credit Information**

BellSouth does not share this information because of the Credit Reporting Act. BellSouth chooses not to provide information that would classify BellSouth as a Credit Reporting Agency (Credit Bureau).

***Payment History (except where mandated by state PSC)**

Credit Reporting Agency (same as above)

***Credit Class**

Credit Reporting Agency (same as above)

***BellSouth Visa Information Or Other Credit Options**

Credit Reporting Agency (same as above)

***Order Activity Information**

This information does not provide anything specific or helpful. It only provides the previous service order numbers with due date that completed within the last month. It does not indicate what activity the service order completed.

***Bill Section Concession Codes**

Concession codes do not provide value to a CLEC. This is a BellSouth internal code only. The concession codes in the S&E will be sent because there is no way to suppress them.

***Bill Section Tax Codes**

Tax Codes do not provide value to a CLEC.

***Bill Section BTN**

BTN information does not provide value to a CLEC.

***Installment and Deferred Payment Plans**

Credit Reporting Agency (same as above)

***Itemized Toll Charges**

This data element is not a part of the CSR at all. To deliver this data element additional development would be required to get this data element from the CRIS Bills Database records.

The Billing name and address (including BN1, BN2, BN3, BA2, BA3, BA4, PO) is the only information provided from the bill section of the CSR.

PIC and all related codes were previously listed as an exclusion, but it has been decided that this information can be provided.

CPNI accounts will not be furnished via on-line system. The customer has elected to restrict access to his CSR. The CLEC must contact the LCSC and furnish a Letter of Agency to obtain the CSR.

A CLEC may not access a CSR belonging to another CLEC. This information is not BellSouth's information to share.

ATTACHMENT 12

NORTH CAROLINA UTILITIES COMMISSION

TRANSCRIPT OF TESTIMONY

BELLSOUTH TELECOMMUNICATIONS, INC.

**BellSouth's In-Region InterLATA Service Pursuant
to Section 271 of the Telecommunications Act of 1996**

DOCKET NO. P-55, Sub 1022

VOLUME 7

September 25, 1997

DATE _____

1 getting preordering information, and it is, but not to
2 the exclusion of the firm order mode. You can get
3 preordering information either way.

4 Q. And when the hold function is employed in RNS, how
5 long is that number -- how long is the number associated
6 with that order held?

7 A. I believe it's thirty (30) days.

8 Q. All right.

9 Again, looking back to the RNS DOE demo
10 yesterday, assume you've got a customer -- new customer,
11 new address, says I need four lines. I want one main
12 number. I want a number for the kids. I want a number
13 for the fax machine, and I want a number for the
14 InterNet.

15 Is there information available to the
16 BellSouth customer service representative to know
17 whether facilities are available to provide four lines
18 to that customer without requiring a premises visit?

19 A. No.

20 Q. It is not available through any of the systems
21 available to the BellSouth representative?

22 A. No, they can't see the number of facilities that
23 are available.

24 Q. If you would turn to the -- the summary of your

1 through EDI?

2 A. Yes.

3 Q. And is that list what you sometimes call simple
4 resold services?

5 A. I don't know if I used that term.

6 Q All right. Can we use it today just so when I say
7 simple resold services we'll be talking about the -- the
8 thirty (30) items on exhibit nineteen (19)?

9 A. Okay.

10 Q. All right.. Is it true that when an order for one
11 of these thirty (30) simple services is placed through
12 EDI that the Order flows through the downstream systems
13 of LEO, LESOG, SOCS, I believe that we saw on one of
14 your exhibits yesterday, and results in a mechanically
15 generated order at the end of the process?

16 A. Yes, that's -- if -- if you look at the heading on
17 this particular exhibit, this is a list of services
18 available with mechanized order generation, that means
19 all the way through.

20 Q. All right. And there are -- is there any
21 situation in which a properly formatted correct order
22 for one of these thirty (30) services would fall out of
23 the system and not generate a mechanized order?

24 A. I'm not aware of any exceptions.

1 It is not a new installation, not a new
2 customer, but simply a migration of an existing
3 customer, a customer who has twenty (20) DID trunks from
4 BellSouth today, and says, I would like to become a
5 customer of the CLP, essentially a change as is, is that
6 required to go through this account team complex order
7 process that you have described?

8 A. Yes, and something similar would happen for a
9 BellSouth retail customer, if one company were buying
10 another company, for example, and an account team -- if
11 one company that had complex services was buying -- was
12 being bought by another company, and account team would
13 make sure that all of that activity was handled
14 properly, because when you got into complex services,
15 you're dealing with complicated account structures,
16 maybe multiple layers of billing, and it requires
17 someone with some expertise and knowledge of the account
18 to actually be involved in that process.

19 Q. And I understand if we were dealing with State
20 Government that there might be several layers of billing
21 and quite a complex arrangement, but would you expect
22 that type of complexity with the twenty (20) DID trunks
23 that I have described?

24 A. It could be.

1 Q. Is it also possible it could not be?

2 A. I think that any time you get into something that
3 involves DID, the likelihood that there are going to be
4 other complicating factors on the account is very high.

5 Q. Let me turn back just for a minute to RNS and DOE,
6 and ask you do all orders entered through RNS, if they
7 are properly formatted and correctly entered, do they
8 flow through BellSouth's downstream systems, and result
9 at the end in the generation of mechanical order --
10 mechanized generation of a order?

11 A. Anything that is ordered through RNS, that's
12 correct, but as we said yesterday, there are some things
13 that you can't necessarily order through RNS, so that
14 doesn't categorically apply to all residence services.

15 Q. Okay. Well, I'm going to talk about DOE because
16 anything you can't order -- let me ask this way.

17 Anything you can order -- anything that can be
18 ordered from BellSouth, or anything that BellSouth can
19 provide can be ordered through DOE, is that correct?

20 A. Yes.

21 Q. Okay. It's sort of like you're the carrier of
22 last resort. It's the order entry system of last
23 resort?

24 A. Yes, more or less.

1 If there were an invalid address that would
2 come back to the LCSC for some sort of resolution?

3 A. Yes.

4 Q. If there was a PIC code that presubscribed
5 interexchange carrier code that was an invalid code,
6 that would come back to the LCSC?

7 A. Yes.

8 Q. If a telephone number had been entered -- miskeyed
9 on the order and you were trying to place an order for a
10 new installation and it was a working telephone number,
11 that would come back to the LCSC?

12 A. Yes.

13 Q. Is there a way to describe generally which types
14 of rejects that come to the LCSC are corrected by the
15 LCSC, and which types of rejects are funneled back to
16 the CLP for further handling by it?

17 A. I guess the -- I don't know that there is a term
18 of art for it, but obvious errors -- I mean, ones that
19 the LCSC could recognize simply by looking at the Order
20 and understanding that the CLP had failed to validate
21 the address using the address validation tool, for
22 example, would be corrected by the LCSC.

23 I mean, they can see what's wrong with the
24 order. If -- if it's something that requires the -- the

1 CLP to clarify, or then -- then they'd have to send it
2 back to the CLP. I mean, there is just not a term of
3 art to describe it I don't think.

4 Q. Okay. Fair enough.

5 In the case of a BellSouth order that has been
6 placed into the system through RNS or DOE, those orders
7 don't go to LEO and LESOG, do they?

8 A. No, they don't. In RNS there are analogous
9 systems.

10 Q. And I'm not going to ask you to name them because
11 the names are just going to confuse me more because I
12 never could figure out what they stood for, but there --
13 it goes through several systems and they all do end up
14 at SOCS at the end of the day?

15 A. Right.

16 Q. If a BellSouth order gets rejected by any of those
17 downstream systems for any of the types of reasons we've
18 talked about, how does that reject -- how and to whom
19 does that reject get communicated back?

20 A. It goes to a center known as the TRECC, and that's
21 stands for trouble resolution -- excuse me, it's TRECC,
22 trouble resolution and error correction center.

23 And that's a center with BellSouth service
24 representatives that would perform the same kind of

1 trouble resolution and error correction that would be
2 done in the LCSC for the CLPs.

3 Q. And that reject comes back and -- and pops up on
4 the screen of some service representative that says here
5 is an Order with the problem -- you know -- solve it?

6 A. Actually, no, it dumps out to a printer every
7 night, and they pick up the list from the printer in the
8 morning and go into the system and try to -- try to
9 figure out what needs to be done.

10 Q. Now, I'm going to ask you to define another term,
11 jeopardy -- in fact, let me define jeopardy and ask you
12 if I've got it right.

13 Is a jeopardy a situation where there has been
14 a committed due date, a date by which something was
15 going to be done and then for some reason it either
16 doesn't get done on that date, or it becomes obvious
17 that it won't be done on that date?

18 A. Yes, that's -- that's a general meaning.

19 Q. Okay. And I believe in the telephone world there
20 are probably two kinds of jeopardies. One kind is a --
21 there may be more than two. I have learned about two of
22 them. There is a -- what you would call a facilities
23 jeopardy, and there is what you would call a customer
24 caused jeopardy. Do those phrases have some meaning to